

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	
Amateur Radio Service Rules to Eliminate)	RM - 10786
Morse Code Proficiency Testing Requirements)	
For All Classes of Amateur Licenses)	
)	
To: The Commission)	

Comments Of Kenneth C. Nowinski

I applaud other administrations that already have eliminated Morse testing requirements for HF privileges. With the recognition by the IARU that Morse proficiency is not in the best interests for the future of the amateur radio service, I feel that the Commission should eliminate Morse testing to promote and encourage America's pool of operators to be readily available for emergency services.

With severe tragic events that have happened in this nation in the recent past, we need more hams to lend their communication skills to the life saving efforts of human life. This is essential. Morse skill is but one slice of the pie for operating. Add to that the fact that no government or commercial service requires the use of Morse code nor maintains its use to this day.

A person not possessing Morse proficiency can contribute greatly to the advancement of the radio art. One person can have the excellent communication skill of speaking well and efficiently, which can serve in numerous public service needs. That same person can use technical computer skills and know how to communicate well and efficiently in digital modes as well. What great assets in these people that are not being utilized due to current Morse testing.

In proceedings in 1990 and 1999 significant public comments along with the Commissions own determination (as referenced in the NCI Petition) clearly indicate that Morse testing requirements are unnecessary and undesirable.

The Commission has the opportunity at this time to amend its Part 97 rules to eliminate Morse proficiency requirements. By granting NCI's Petition, a burden on applicants for amateur radio licenses would be removed, no additional requirement would be imposed, and therefore no party or other person would be prejudiced by such Commission action. This course of action would save considerable resources on behalf of the Commission on a subject that was previously determined that Morse code does not align with the purpose of the Amateur Radio Service and no longer serves any regulatory purpose.

Equally important is that the Commission should refrain from combining NCI's request for the prompt elimination of Morse test requirements from its rules with other substantially unrelated issues such as, but not limited to, band segmentation, changes in the number of license classes, sweeping changes in operator privileges by license class, etc., because that would result in unnecessary delays in resolving this important and clear-cut issue.

I believe strongly and whole heartedly, for all of the reasons outlined previously that the Commission should enact the following changes to its rules in the most expeditious manner possible. The Commission should eliminate the "Element 1" Morse test totally from the rules for all license classes. Technician class licensees should be grandfathered to the privileges of Technician Plus class licensees.

I am not against the practice and usage of Morse code. However, as time marches on and we become a more diverse world, I find it hard to understand how a licensed amateur radio operator can be prohibited from using voice or digital modes just because he or she cannot show proficiency in Morse code.

Respectfully submitted,

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